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July 20, 2020

**RE: *Roc Nation, LLC v. HCC International Insurance Company, PLC*; Case No.: 1:19-cv-00554**

Dear Judge Engelmayer:

The Parties jointly request permission, pursuant to Section 4(B) of Your Honor's Individual Rules and Practices, to file an unreacted version of the Joint Statement of Undisputed Facts ("Joint Statement") under seal. These statements relate to sensitive proprietary and confidential information of Roc Nation, and include statements and summaries of information designated as confidential.

The Stipulated Confidentiality Agreement and Protective Order in this case [ECF No. 43] (the "Protective Order") allows counsel to designate records exchanged in discovery and deposition testimony as Confidential under Sections 2 & 4 respectively. Section 10 requires the parties to file this information under seal, to the extent permitted by the Court. The proposed redactions to the Joint Statements are citations and/or discussions of confidential financial and business operations of Roc Nation and third parties that were designated confidential during the discovery process. This information was exchanged as confidential in an attempt by the parties and the court to avoid disputes and to further develop the parties ability to present the case, but there have been no objections to the designations to date.

Moreover, in order to agree to the language in the Joint Statement, the parties agreed that by including certain facts on the Joint Statement, they were not agreeing that any of the facts were material. As the motions were framed at the pre-motion conference, there is no representation at this time by either party that the confidential and proprietary facts which are the subject of the redactions are material to the dispute or otherwise necessary for the Court to render judgment on the parties' Rule 56 motions. The specific request to seal and/or redact the documents referenced in the Joint Statement will be the subject of a later request, but will made on similar grounds.

For these reasons, good cause exists for granting this request. The request is submitted under the terms and for the reasons set forth the Protective Order, and the parties understood that their confidentiality designations would apply to information filed with the Court. In order to comply with the Local Rules and the Court's prior instructions, the parties have attempted to narrow this request to the extent possible.

Very truly yours,

/s/ Amber Finch

Amber S. Finch  
Reed Smith LLP  
*Attorney for Plaintiff, Roc Nation, LLC*

Granted.

7/21/20

SO ORDERED.

/s/ George J. Vogrin

George J. Vogrin  
Vogrin & Frimet LLP  
*Attorneys for Defendant, Houston Casualty Company*

PAUL A. ENGLMAYER  
United States District Judge